IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

INTERNATIONAL BUSINESS MACHINES CORPORATION,	)))	
Plaintiff,	))	C.A. No. 16-122-LPS
v.	))	**JURY TRIAL DEMANDED**
GROUPON, INC.	)))	
Defendant.	)	

SUPPLEMENTAL JOINT CLAIM CONSTRUCTION CHART

Pursuant to Paragraph 12 of the Court's Scheduling Order (D.I. 17), Plaintiff International

Business Machines Corporation and Defendant Groupon, Inc., submit this Supplemental Joint

Claim Construction Chart for U.S. Patent Nos. 5,796,967 ("the '967 patent"), 7,072,849 ("the

'849 patent"), 5,961,601 ("the '601 patent"), and 7,631,346 ("the '346 patent") to update the

parties' proposed constructions and to reflect the parties' agreement on an additional term related

to the '601 patent. The Supplemental Joint Claim Construction chart is attached as Exhibit A.

The exhibits to the original Joint Claim Construction Chart (D.I. 51) are unchanged and are

incorporated herein by reference.

POTTER ANDERSON & CORROON LLP

By: /s/ Bindu A. Palapura
    David E. Moore (#3983)
    Bindu A. Palapura (#5370)
    Stephanie E. O'Byrne (#4446)
    Hercules Plaza, 6th Floor
    1313 N. Market Street
    Wilmington, DE 19801
    Tel: (302) 984-6000
    dmoore@potteranderson.com
    bpalapura@potteranderson.com
    sobyrne@potteranderson.com

Attorneys for Plaintiff

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ASHBY & GEDDES

By: /s/ John G. Day
    John G. Day (#2403)
    Andrew C. Mayo (#5207)
    500 Delaware Avenue, 8th Floor
    P.O. Box 1150
    Wilmington, DE 19899
    Telephone: (302) 654-1888
    jday@ashby-geddes.com
    amayo@ashby-geddes.com

Attorneys for Defendant

Supplemental Joint Claim Construction Chart For U.S. Patent No. 5,796,967[1]

Claim No.	Claim Term/Phrase	Plaintiff's Proposed Construction	Plaintiff's Identification of Evidence	Defendant's Proposed Construction	Defendant's Identification of Evidence
1, 2-4, 12, 17	object(s)	data structure(s) that have a uniform, self-defining format known to the reception system	**Intrinsic Evidence** *See, e.g.*, Ex. A-1, U.S. Patent No. 5,796,967 (the "'967 Patent"), 4:7-11; 5:49-58; 6:16-22; 6:23-25; 6:33-38; 8:3-5; 7:64-65; 7:66-8:18; 8:66-9:9; 10:60-11:4; 11:10-25; 12:56-65; 13:60-62; 15:67-16:4; Figs. 4a-5a; claims 1, 2, and 12. *See, e.g.*, Ex. A-2, Feb. 21, 1996 Office Action (IBM-GROUPON00000357-363), at 5. *See, e.g.*, Ex. A-3, July 16, 1997 Amendment E (IBM-GROUPON00000385-	data structure(s)	**Intrinsic Evidence** '967 and '849 Patents (pinpoint cites to '967 Patent specification for simplicity): claim language, abstract, Figures 3b, 4a, 4b, 4c, 4d, 5a, 5b, 6, 7, 8, 9, 10; 4:7-52, 5:4963, 6:16-7:2, 7:668:18, 8:35-47, 8:669:9, 10:66-15:7, 15:67-16:63, 26:5-61; 39:45-54. File History for 07/388,156: Ex. A-11, Mar. 1991 Applicants' Disclosure Statement, at 13-14; Ex. A-12, Oct. 23, 1992 Amendment, at 30-31; Ex. A-13, Apr. 18,

Claim No.	Claim Term/Phrase	Plaintiff's Proposed Construction	Plaintiff's Identification of Evidence	Defendant's Proposed Construction	Defendant's Identification of Evidence
			408), at 7, 10, 11, 12, 21. *See, e.g.*, Ex. A-4, Oct. 12, 1995 Amendment C (IBM-GROUPON00000344-354), at 4-5. *See, e.g.*, Ex. A-5, Oct. 21, 1994 Information Disclosure Statement (IBM-GROUPON00000283 -316), at 2, 5. *See, e.g.*, Ex. A-6, Oct. 21, 1994 Amendment (IBM-GROUPON00000318 -327), at 9. *See, e.g.*, Ex. A-7, Aug. 21, 1996 Interview Summary (IBM-GROUPON00000365).		1994 Amendment, at 11-13 '967 Patent File History: Ex. A-5, October 21, 1994 Information Disclosure Statement (IBM-GROUPON00000283-316), at 2; Ex. A-3, July 22, 1997 Amendment, at 7 '849 Patent File History: Ex. B-5, Nov. 1, 1996 Interview Summary at 2; Ex. B-3, Dec. 23, 2005 Decision on Appeal, at 6-10, 17; Ex. B-2, Feb. 27, 2002 Decision on Appeal, at 20-25, 39-40; Ex. B-19, Oct. 27, 1997 Office Action, at 5.
1	a first partition for presenting	plain and ordinary meaning	**Intrinsic Evidence** *See e.g.*, Ex. A-1, '967	a fixed portion of the screen that is	**Intrinsic Evidence** '967 and '849 Patents

Claim No.	Claim Term/Phrase	Plaintiff's Proposed Construction	Plaintiff's Identification of Evidence	Defendant's Proposed Construction	Defendant's Identification of Evidence
	applications	or, alternatively a first area for presenting applications	patent, Abstract; 1:15-34; 2: 19-38; 3:1-21; 3:44-48; 8:54-65; 9:36-10:4; 11:5-12:13; 15:66-16:9; 17:59-18:23; 20:12-32 20:45-21:4; 35:53-37:38; claims 14, 15, 16, 17. *See e.g.,* Ex. A-2, Feb. 21, 1996 Office Action (IBM-GROUPON00000357-363), at 2-6. *See e.g.,* Ex. A-3, July 16, 1997 Amendment E (IBM-GROUPON00000385-408), at 7-8, 13. *See e.g.,* Ex. A-4, Oct. 12, 1995 Amendment C (IBM-GROUPON00000344-354), at 4-5, 8. *See e.g.,* Ex. A-6, Oct. 21, 1994 Amendment A (IBM-	dedicated for displaying applications	(pinpoint cites to '967 Patent specification for simplicity): Ex. A-1, Figs. 3a; Fig. 3b; 4c; 4d; 5a; 5b; 9a; Summary of the Invention; 2:52-55; 9:37-40; 9:47-53; 11:5-10; 11:26-34; 11:35-39; 12:35-37; 14:31-36; 16:4-7; 36:53-65; 36:66-37:6 '967 Patent File History: Ex. A-4 Oct. 12, 1995 Office Action Response, at 5, 8.

Claim No.	Claim Term/Phrase	Plaintiff's Proposed Construction	Plaintiff's Identification of Evidence	Defendant's Proposed Construction	Defendant's Identification of Evidence
			GROUPON00000318 - 327), 7-9. *See e.g.,* Ex. A-8, Apr. 17, 1994 Office Action (IBM-GROUPON00000279 - 282), at 3. *See e.g.,* Ex. A-9, Apr. 11, 1995 Office Action (IBM-GROUPON00000338 - 343), at 2-3. *See e.g.,* Ex. A-10, Jan. 9, 1997 Office Action (IBM-GROUPON00000373-384), at 3-4, 5, 7. *See e.g.*, Ex. B-2, Feb. 27, 2002 BPAI Decision (IBM-GROUPON00002032-2082), at 20, 38-42, 48. *See e.g.*, Ex. B-3, Dec. 23, 2005 BPAI Decision (IBM-		

Claim No.	Claim Term/Phrase	Plaintiff's Proposed Construction	Plaintiff's Identification of Evidence	Defendant's Proposed Construction	Defendant's Identification of Evidence
			PCNL00002605-2665), at 7-8, 12-13, 47. *See e.g.*, Ex. B-7, Sept. 16, 2003 Amendment (IBM-GROUPON00002352-2387), at 2-8, 13-14. *See e.g.*, Ex. B-9, Apr. 30, 1996 Office Action (IBM-GROUPON00001342-1360), at 5-6, 11. *See e.g.*, Ex. B-11, June 19, 2003 Office Action (IBM-GROUPON00002337-2349), at 3-4. *See e.g.*, Ex. B-12, Dec. 18, 2003 Office Action (IBM-GROUPON00002412-2433), at 3, 4, 8, 9, 16, 17. *See e.g.*, Ex. B-13,		

Claim No.	Claim Term/Phrase	Plaintiff's Proposed Construction	Plaintiff's Identification of Evidence	Defendant's Proposed Construction	Defendant's Identification of Evidence
			Sept. 27, 2002 Decision On Request For Rehearing (IBM-GROUPON00002184-2275), at 7, 9-13. Ex. B-14 June 15, 1995 Office Action (IBM-GROUPON00001299-1317), at 4-7. Ex. B-15 Dec. 28, 1995 Office Action Response (IBM-GROUPON00001318-1341), at 5, 6, 9-11.		
1	a second partition for presenting a plurality of command functions	plain and ordinary meaning or, alternatively a second area for presenting a plurality of command functions	**Intrinsic Evidence** *See e.g.*, Ex. A-1, '967 Patent, Abstract; 1:15-34; 2:19-38; 3:1-21; 3:44-48; 8:54-65; 9:36-10:4; 11:5-12:13; 15:66-16:9; 17:59-18:23; 20:12-32; 20:45-21:4; 36:53-37:38; claims 14, 15, 16, 17. *See e.g.*, Ex. A-2, Feb.	a fixed portion of the screen that is dedicated to displaying command functions which does not overlap with the fixed portion of the screen that is dedicated for displaying applications	**Intrinsic Evidence** '967 and '849 Patents (pinpoint cites to '967 Patent specification for simplicity): 3:17-21; 17:36-41 '967 Patent File History: Ex. A-4 Oct. 12, 1995 Office Action Response, at 5-6.

Claim No.	Claim Term/Phrase	Plaintiff's Proposed Construction	Plaintiff's Identification of Evidence	Defendant's Proposed Construction	Defendant's Identification of Evidence
			21, 1996 Office Action (IBM-GROUPON00000357-363), at 2-6. *See e.g.*, Ex. A-3, July 16, 1997 Amendment E (IBM-GROUPON00000385-408), at 7-8, 13. *See e.g.,* Ex. A-4, Oct. 12, 1995 Amendment C (IBM-GROUPON00000344-354), at 4-5, 8. *See e.g.* Ex. A-6, *Oct.* 21, 1994 Amendment A (IBM-GROUPON00000318 - 327), 7-9. *See e.g.,* Ex. A-8 Apr. 17, 1994 Office Action (IBM-GROUPON00000279 - 282), at 3. *See e.g.,* Ex. A-9, Apr.		

Claim No.	Claim Term/Phrase	Plaintiff's Proposed Construction	Plaintiff's Identification of Evidence	Defendant's Proposed Construction	Defendant's Identification of Evidence
			11, 1995 Office Action (IBM-GROUPON00000338 - 343), at 2-3. *See e.g.*, Ex. A-10, Jan. 9, 1997 Office Action (IBM-GROUPON00000373-384), at 3-4, 5, 7. *See e.g.*, Ex. B-2, Feb. 27, 2002 BPAI Decision (IBM-GROUPON00002032-2082), at 20, 38-42, 48. *See e.g.*, Ex. B-3, Dec. 23, 2005 BPAI Decision (IBM-PCNL00002605-2665), at 7-8, 12-13, 47. *See e.g.*, Ex. B-7, Sept. 16, 2003 Amendment (IBM-GROUPON00002352-2387), at 2-8, 13-14.		

Claim No.	Claim Term/Phrase	Plaintiff's Proposed Construction	Plaintiff's Identification of Evidence	Defendant's Proposed Construction	Defendant's Identification of Evidence
			See e.g., Ex. B-9, Apr. 30, 1996 Office Action (IBM-GROUPON00001342-1360), at 5-6, 11. *See e.g.,* Ex. B-11, June 19, 2003 Office Action (IBM-GROUPON00002337-2349), at 3-4. *See e.g.*, Ex. B-12, Dec. 18, 2003 Office Action (IBM-GROUPON00002412-2433), at 3, 4, 8, 9, 16, 17. *See e.g.*, Ex. B-13, Sept. 27, 2002 Decision On Request For Rehearing (IBM-GROUPON00002184-2275), at 7, 9-13. Ex. B-14 June 15, 1995 Office Action (IBM-GROUPON00001299-		

Claim No.	Claim Term/Phrase	Plaintiff's Proposed Construction	Plaintiff's Identification of Evidence	Defendant's Proposed Construction	Defendant's Identification of Evidence
			1317), at 4-7. Ex. B-15 Dec. 28, 1995 Office Action Response (IBM-GROUPON00001318-1341), at 5, 6, 9-11.		

Agreed Constructions

Claim No.	Claim Term/Phrase	Agreed Construction
1-7, 12	application(s)	information events composed of a sequence of one or more pages opened at a screen
1	the objects being retrieved from the objects stored at the respective reception system, or if unavailable from the objects stored at the respective reception system, then from the network	the objects being retrieved from the objects stored at the respective reception system, or, if the current versions of the objects are not present from the objects stored at the respective reception system, then from the network
4	The method of claim 2 wherein the predetermined plan	[requires no construction]
2	permit random movement	allow navigation to other application at the user's behest
3, 4	at least one procedure for navigating to a new application / a plurality of different procedure for navigating to a new application	at least one procedure for moving to another application/ a plurality of different procedures for moving to another application

Claim No.	Claim Term/Phrase	Agreed Construction
4, 5, 17	storage control parameter	a parameter that identifies the storage characteristic for the object, which may be for initial and/or continued storage
1	computer network / the network	two or more interconnected computers
1, 2, 12, 17	partition(s)	[plain and ordinary meaning]
1, 2, 4	command function(s)	a function that enables the user to interact with the reception system and other elements of the network

Supplemental Joint Claim Construction Chart For U.S. Patent No. 7,072,849[2]

Claim No.	Claim Term/Phrase	Plaintiff's Proposed Construction	Plaintiff's Identification of Evidence	Defendant's Proposed Construction	Defendant's Identification of Evidence
1-3, 13-16	object(s)	data structure(s) that have a uniform, self-defining format known to the reception system	**Intrinsic Evidence** *See, e.g.*, Ex. B-1, U.S. Patent No. 7,072,849 (the "'849 Patent"), 5:51-60; 6:18-24; 6:25-27; 6:36-39; 7:66-67; 8:1-20; 10:64-11:8; 11:15-20; 12:65-13:2; 13:64-66; 16:11-15. *See, e.g.*, Ex. B-2, Feb. 27, 2002 BPAI Decision (IBM-GROUPON00002032-2082), at 39-40. *See, e.g.*, Ex. B-3, Dec. 23, 2005, BPAI Decision (IBM-GROUPON00002605-2665), at 8-9.	data structure(s)	**Intrinsic Evidence** '967 and '849 Patents (pinpoint cites to '967 Patent specification for simplicity): claim language, abstract, Figures 3b, 4a, 4b, 4c, 4d, 5a, 5b, 6, 7, 8, 9, 10; 4:7-52, 5:49-63, 6:16-7:2, 7:66-8:18, 8:35-47, 8:66-9:9, 10:66-15:7, 15:67-16:63, 26:5-61; 39:45-54 File History for 07/388,156: Ex. A-11, Mar. 1991 Applicants' Disclosure Statement, at 13-14; Ex. A-12, Oct. 23, 1992 Amendment, at 30-31; Ex. A-13 Apr. 18, 1994

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[2] Cited portions of text are inclusive of the figures referenced therein and vice versa. The parties reserve the right to rely on any evidence cited in the Joint Claim Construction Chart. Inclusion of a cite for a particular evidentiary citation does not preclude reliance on any other part of that evidence.

Claim No.	Claim Term/Phrase	Plaintiff's Proposed Construction	Plaintiff's Identification of Evidence	Defendant's Proposed Construction	Defendant's Identification of Evidence
			See, e.g., Ex. B-4, Oct. 19, 1994 Amendment (IBM-GROUPON00001233-1257), at 21. *See, e.g.*, Ex. B-5, Nov. 1, 1996 Interview Summary (IBM-GROUPON00001364-1366). *See e.g.*, Ex. B-6, Mar. 18, 2004 Amendment (IBM-GROUPON00002434-2460), at 2-3. *See, e.g.*, Ex. B-10 Apr. 29, 2002 Request for Rehearing (IBM-GROUPON00002150-2181), 4.		Amendment, at 11-13 '967 Patent File History: Ex. A-5, Oct. 21, 1994 Information Disclosure Statement (IBM-GROUPON00000283-316), at 2; Ex. A-3, July 22, 1997 Amendment, at 7 '849 Patent File History: Ex. B-5, Nov. 1, 1996 Interview Summary at 2; Ex. B-3, Dec. 23, 2005 Decision on Appeal, at 6-10, 17; Ex. B-2, Feb. 27, 2002 Decision on Appeal, at 20-25, 39-40; Ex. B-19, Oct. 27, 1997 Office Action, at 5.
1, 13, 14	selectively storing advertising objects at a store established at the reception system	storing advertisement objects according to a predetermined storage criterion at a store established at the reception system	**Intrinsic Evidence** *See, e.g.*, Ex. B-1, '849 Patent, 4:36-39; 9:1-9; 6:57-7:3; 10:7-19; 10:41-15:16; 25:55-64; 27:47-50;	pre-fetching advertising objects and storing at a store established at the reception system in	**Intrinsic Evidence** '967 and '849 Patents (pinpoint cites to '849 Patent specification for simplicity): claim language, abstract,

Claim No.	Claim Term/Phrase	Plaintiff's Proposed Construction	Plaintiff's Identification of Evidence	Defendant's Proposed Construction	Defendant's Identification of Evidence
			28:37-49; 29:61-30:26; 33:16-36:53; 37:19-29; Fig. 8; claims 1, 3, 9, 14, 22. *See e.g.,* Ex. B-3, Dec. 23, 2005, BPAI Decision (IBM-GROUPON00002605-2665), at 9-10. *See e.g.,* Ex. B-6, Mar. 18, 2004 Amendment (IBM-GROUPON00002434-2460), at 3. *See e.g.,* Ex. B-8, Oct. 1, 2004 Appeal Brief (IBM-GROUPON00002486-2557), at 6-7. *See e.g.,* Ex. B-10, Apr. 29, 2002 Request for Rehearing (IBM-GROUPON00002150-2181), at 4.	anticipation of display concurrently with the applications	Figure 8; 1:24-25; 3:16-21; 10:2-27, 26:54-63, 33:16-35:8 '849 Patent File History: Ex. B-8, Oct. 1, 2004 Appeal Brief, at 6-7, 25, 35, 41; Ex. B-16, Feb. 25, 2005 Reply Brief, at 9-11; Ex. B-3, Dec. 23, 2005 Decision on Appeal, at 9-10, 25-26.

Claim No.	Claim Term/Phrase	Plaintiff's Proposed Construction	Plaintiff's Identification of Evidence	Defendant's Proposed Construction	Defendant's Identification of Evidence
1, 13	structuring applications so that they may be presented through the network at a first portion of one or more screens of display / structuring applications so that they may be presented at a first portion of one or more screens of display	plain and ordinary meaning or, alternatively formatting applications so that they may be presented through the network at a first area of one or more screens of display / formatting applications so that they may be presented at a first area of one or more screens of display	**Intrinsic Evidence** *See e.g.,* Ex. B-1, '849 Patent, Abstract; 1:15-31; 3:5-31; 8:56-67; 9:34-10:6; 11:9-12:16; 16:10-20; 18:3-37; 20:59-21:18. *See e.g.*, Ex. B-2, Feb. 27, 2002 BPAI Decision (IBM-GROUPON00002032-2082), at 20, 38-42, 48. *See e.g.*, Ex. B-3, Dec. 23, 2005 BPAI Decision (IBM-PCNL00002605-2665), at 7-8, 12-13, 47. *See e.g.*, Ex. B-7, Sept. 16, 2003 Amendment (IBM-GROUPON00002352-2387), at 2-8, 13-14. *See e.g.,* Ex. B-9, Apr. 30, 1996 Office	formatting applications so that they are displayed on a fixed portion of the screen that is dedicated to displaying applications	**Intrinsic Evidence** '967 and '849 Patents (pinpoint cites to '967 Patent specification for simplicity): Figs. 3a; Fig. 3b; 4c; 4d; 5a; 5b; 9a; Summary of the Invention; 2:52-55; 9:37-40; 9:47-53; 11:5-10; 11:26-34; 11:35-39; 12:35-37; 14:31-36; 16:4-7; 36:53-65; 36:66-37:6.

Claim No.	Claim Term/Phrase	Plaintiff's Proposed Construction	Plaintiff's Identification of Evidence	Defendant's Proposed Construction	Defendant's Identification of Evidence
			Action (IBM-GROUPON00001342-1360), at 5-6, 11. *See e.g.,* Ex. B-11, June 19, 2003 Office Action (IBM-GROUPON00002337-2349), at 3-4. *See e.g.*, Ex. B-12, Dec. 18, 2003 Office Action (IBM-GROUPON00002412-2433), at 3, 4, 8, 9, 16, 17. *See e.g.*, Ex. B-13, Sept. 27, 2002 Decision On Request For Rehearing (IBM-GROUPON00002184-2275), at 7, 9-13. Ex. B-14 June 15, 1995 Office Action (IBM-GROUPON00001299-1317), at 4-7.		

Claim No.	Claim Term/Phrase	Plaintiff's Proposed Construction	Plaintiff's Identification of Evidence	Defendant's Proposed Construction	Defendant's Identification of Evidence
			Ex. B-15 Dec. 28, 1995 Office Action Response (IBM-GROUPON00001318-1341), at 5, 6, 9-11. *See e.g.*, Ex. A-2, Feb. 21, 1996 Office Action (IBM-GROUPON00000357-363), at 2-6. *See e.g.*, Ex. A-3, July 16, 1997 Amendment E (IBM-GROUPON00000385-408), at 7-8, 13. *See e.g.,* Ex. A-4, Oct. 12, 1995 Amendment C (IBM-GROUPON00000344-354), at 4-5, 8. *See e.g.* Ex. A-6, *Oct.* 21, 1994 Amendment A (IBM-GROUPON00000318 - 327), 7-9.		

Claim No.	Claim Term/Phrase	Plaintiff's Proposed Construction	Plaintiff's Identification of Evidence	Defendant's Proposed Construction	Defendant's Identification of Evidence
			See e.g., Ex. A-8 Apr. 17, 1994 Office Action (IBM-GROUPON00000279 - 282), at 3. *See e.g.,* Ex. A-9, Apr. 11, 1995 Office Action (IBM-GROUPON00000338 - 343), at 2-3. *See e.g.,* Ex. A-10, Jan. 9, 1997 Office Action (IBM-GROUPON00000373-384), at 3-4, 5, 7.		
1, 13	at a second portion of one or more screens of display concurrently with applications	plain and ordinary meaning or, alternatively at a second area of one or more screens of display concurrently with applications	**Intrinsic Evidence** *See e.g.,* Ex. B-1, '849 patent at Abstract; 1:15-31; 3:5-31; 8:56-67; 9:34-10:6; 11:9-12:16; 16:10-20; 18:3-37; 20:59-21:18. *See e.g.,* Ex. B-2, Feb. 27, 2002 BPAI Decision (IBM-GROUPON00002032-2082), at 20, 38-42,	on a second fixed portion of the screen that does not overlap the fixed portion of the screen for displaying applications	**Intrinsic Evidence** '849 Patent: Abstract; 2:26-30; 34:12-16 '849 File History: Ex. B-4 Oct. 24, 1994 Office Action Response at 13; Ex. B-17 June 15, 1995 Office Action, at 5; Ex. B-18 Dec. 28, 1995 Office Action Response, at 11; Ex. B-

Claim No.	Claim Term/Phrase	Plaintiff's Proposed Construction	Plaintiff's Identification of Evidence	Defendant's Proposed Construction	Defendant's Identification of Evidence
			48. *See e.g.*, Ex. B-3, Dec. 23, 2005 BPAI Decision (IBM-GROUPON00002605-2665), at 7-8, 12-13, 47. *See e.g.*, Ex. B-7, Sept. 16, 2003 Amendment (IBM-GROUPON00002352-2387), at 2-8, 13-14. *See e.g.*, Ex. B-9, Apr. 30, 1996 Office Action (IBM-GROUPON00001342-1360), at 5-6, 11. *See e.g.*, Ex. B-11, June 19, 2003 Office Action (IBM-GROUPON00002337-2349), at 3-4. *See e.g.*, Ex. B-12, Dec. 18, 2003 Office Action (IBM-		2 Feb. 27, 2002 Board Decision, at 16; Ex. B-10 Apr. 29, 2002 Appeal Brief, at 3.

Claim No.	Claim Term/Phrase	Plaintiff's Proposed Construction	Plaintiff's Identification of Evidence	Defendant's Proposed Construction	Defendant's Identification of Evidence
			GROUPON00002412-2433), at 3, 4, 8, 9, 16, 17. *See e.g.*, Ex. B-13, Sept. 27, 2002 Decision On Request For Rehearing (IBM-GROUPON00002184-2275), at 7, 9-13. Ex. B-14 June 15, 1995 Office Action (IBM-GROUPON00001299-1317), at 4-7. Ex. B-15 Dec. 28, 1995 Office Action Response (IBM-GROUPON00001318-1341), at 5, 6, 9-11. *See e.g.*, Ex. A-2, Feb. 21, 1996 Office Action (IBM-GROUPON00000357-363), at 2-6. *See e.g.*, Ex. A-3, July		

Claim No.	Claim Term/Phrase	Plaintiff's Proposed Construction	Plaintiff's Identification of Evidence	Defendant's Proposed Construction	Defendant's Identification of Evidence
			16, 1997 Amendment E (IBM-GROUPON00000385-408), at 7-8, 13. *See e.g.,* Ex. A-4, Oct. 12, 1995 Amendment C (IBM-GROUPON00000344-354), at 4-5, 8. *See e.g.* Ex. A-6, *Oct.* 21, 1994 Amendment A (IBM-GROUPON00000318 - 327), 7-9. *See e.g.,* Ex. A-8 Apr. 17, 1994 Office Action (IBM-GROUPON00000279 - 282), at 3. *See e.g.,* Ex. A-9, Apr. 11, 1995 Office Action (IBM-GROUPON00000338 - 343), at 2-3. *See e.g.,* Ex. A-10,		

Claim No.	Claim Term/Phrase	Plaintiff's Proposed Construction	Plaintiff's Identification of Evidence	Defendant's Proposed Construction	Defendant's Identification of Evidence
			Jan. 9, 1997 Office Action (IBM-GROUPON00000373-384), at 3-4, 5, 7.		

Agreed Constructions

Claim No.	Claim Term/Phrase	Agreed Construction
1, 13-14	portion	[plain and ordinary meaning]
1, 4, 7-8, 13-14, 17, 20	application(s)	information events composed of a sequence of one or more pages opened at a screen
1-2, 8-9, 12-15, 21, 25	computer network	two or more interconnected computers
1, 14	structuring advertising in a manner compatible to that of the applications so that it may be presented	formatting advertising for potential use with a plurality of applications
8, 21	Storing a predetermined amount of the advertising data in a store established at the respective reception systems	[plain and ordinary meaning]

Claim No.	Claim Term/Phrase	Plaintiff's Proposed Construction	Plaintiff's Identification of Evidence	Defendant's Proposed Construction	Defendant's Identification of Evidence
1, 3, 6, 8, 11-12, 51, 53, 56-57	continuation(s)	a new request in a conversation which a client may send to a server, such as, for example, a hyperlink	**Intrinsic Evidence** *See e.g.*, Ex. C-1, U.S. Patent No. 5,961,601 (the "'601 Patent"), Abstract; Tbl. 1; 1:50-59; 2:48-56; 2:57-63; 4:4-9; 4:45-67; 5:50-67; 6:50-58; 6:59-7:33; 7:33-48; 9:12-37; 9:48-56; 11:52-12:41; 13:28-43; 13:58-15:67; 16:44-17:11. Figs. 1, 4, 7a, 7b, 8. Claims 20 and 56. Ex. C-2, July 6, 1998 Amendment, at 15, 18-19 (IBM-GROUPON00000935-55) Ex. C-3, January 11,	a new request which a client may send to a server, such as, for example a hyperlink	**Intrinsic Evidence** '601 Patent: claim language, 1:61-2:13, 2:47-57, 6:59-7:32.

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[3] Cited portions of text are inclusive of the figures referenced therein and vice versa. The parties reserve the right to rely on any evidence cited in the Joint Claim Construction Chart. Inclusion of a cite for a particular evidentiary citation does not preclude reliance on any other part of that evidence.

Claim No.	Claim Term/Phrase	Plaintiff's Proposed Construction	Plaintiff's Identification of Evidence	Defendant's Proposed Construction	Defendant's Identification of Evidence
			1999 Amendment, at 6 (IBM-GROUPON00001015-23)		
1, 51	all continuations in an output from said service	No construction necessary	**Intrinsic Evidence** Ex. C-1, '601 Patent Abstract; 1:46-59; 4:27-43; 11:43-12:41; 17:12-57; Claims 1, 9, 10, 14, 22, 23, 27, 35, 36, 40, 46, 51, 58, 59,60, 67, 68; Figs. 4 and 8.	all new requests which a client may send to a server, such as, for example a hyperlink in a web page or other output sent to the client	**Intrinsic Evidence** Ex. C-2 July 6, 1998 Office Action Response, at 14; Ex. C-4 May 12, 2016 IBM Preliminary Response to IPR2016-00604, at 11; '601 Patent: Fig. 4; Fig 8; 4:40-43; 4:66-67; 7:8-12; 16:1-4.

Agreed Constructions

Claim No.	Claim Term/Phrase	Agreed Construction
1, 51	recursively embedding the state information in all identified continuations	applying a process one or more times to each identified continuation to modify all identified continuations to include state information
1, 7, 51	conversation(s)	a sequence of communications between a client and server in which the server responds to each request with a set of continuations and the client always picks the next request from the set of continuations
9, 58	filtering one of said	removing one of said hyperlinks and data output from said

Claim No.	Claim Term/Phrase	Agreed Construction
	hyperlinks and data output from said services according to a predetermined criteria	services according to criteria determined prior to removing
10, 59	adding one of said hyperlinks and data to said output from said services according to a predetermined criteria	inserting one of said hyperlinks and data to said output from said services according to criteria determined prior to inserting
11	HTML	HyperText Markup Language
12	CGI program	Common Gateway Interface program
1, 8, 51, 57	stateless protocol	a protocol where every request from a client to a server is treated independently of previous connections
1, 4-6, 8, 51, 54-55, 57	client	a computer which issues commands to the server which performs the task associated with the command
1, 3, 5-7, 11-12, 51, 53, 55, 56	state information	information about a conversation between a client and a server
1	the state information is preserved and provided to all services for the duration of the conversation	No construction necessary

Agreed Constructions

Claim No.	Claim Term/Phrase	Agreed Construction
1	A method for managing user authentication within a distributed data processing system, wherein a first system and a second system interact within a federated computing environment and support single-sign-on operations in order to provide access to protected resources, at least one of the first system and the second system comprising a processor, the method comprising	The preamble is limiting.
1	protected resource(s)	an application, an object, a document, a page, a file, executable code, or other computational resource, communication-type resource, etc., identified by a Uniform Resource Locator (URL), or more generally, a Uniform Resource Identifier (URI), that can only be accessed by an authenticated and/or authorized user
1	federated computing environment	a set of distinct entities, such as enterprises, organizations, institutions, etc., that cooperate to provide a single-sign-on, ease-of-use experience to a user, wherein the enterprises need

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Claim No.	Claim Term/Phrase	Agreed Construction
		not have a direct, pre-established, relationship defining how and what information to transfer about a user
1-3	single-sign-on operation(s)	an authentication process whereby the user is subsequently not required to perform another authentication operation during a particular user session
1	user authentication	the process of validating a set of credentials that are provided by a user or on behalf of a user
3	pull authentication information	obtain authentication information from the first system where a request for authentication information originates from the second system
8	back-channel information retrieval mechanism	a retrieval mechanism that involves communication directly from a second system to a first system

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